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7 Attorney for Richard Lee Trimmer

8
9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 RICHARD LEE TRIMMER,

15 Defendant.
16

Case No. 2:97-cr-00088-RFB

**STIPULATION TO CONTINUE
PROPOSED RELEASE PLAN
DEADLINE AND HEARING**
(First Request)

17 IT IS HEREBY STIPULATED AND AGREED, by and between Steven Myhre, Acting
18 United States Attorney, and Patrick Burns, Assistant United States Attorney, counsel for the
19 United States of America, and Rene L. Valladares, Federal Public Defender, and Nisha Brooks-
20 Whittington, Assistant Federal Public Defender, counsel for Richard Lee Trimmer, that the
21 Proposed Plan Deadline currently scheduled for July 3, 2017, and the Hearing currently
22 scheduled for July 13, 2017 at 11:30 a.m., be vacated and continued to a date and time
23 convenient to the Court, but no sooner than sixty (60) days.

24 This Stipulation is entered into for the following reasons:

25 1. Undersigned counsel is working with the Bureau of Prisons ("BOP") and the
26 United States Probation Office ("USPO") on a possible release plan. Additional time is

1 requested for the BOP and USPO to further research and investigate at least two possible
2 residential facilities that may meet Mr. Trimmer's needs, and thereafter to allow counsel time
3 to prepare a proposed release plan to submit to this Court.

4 2. The defendant is in custody and agrees with the need for the continuance.

5 3. The parties agree to the continuance.

6 This is the first request for a continuance of the proposed plan deadline and hearing.

7 DATED this 30th day of June, 2017.

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9 RENE L. VALLADARES
Federal Public Defender

STEVEN MYHRE
Acting United States Attorney

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11 */s/ Nisha Brooks-Whittington*
By _____

12 NISHA BROOKS-WHITTINGTON
13 Assistant Federal Public Defender

/s/ Patrick Burns
By _____

PATRICK BURNS
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 RICHARD LEE TRIMMER,

7 Defendant.

Case No. 2:97-cr-00088-RFB

ORDER

9
10 IT IS THEREFORE ORDERED that the Proposed Release Plan deadline currently
11 scheduled for July 3, 2017 be vacated and continued to September 13, 2017 and
12 the hearing currently scheduled for July 13, 2017 at 11:30 a.m., be vacated and continued to
13 September 20, 2017 at 11:30 a .m.

14 DATED this 30th of June, 2017.

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17 RICHARD F. BOULWARE, II
18 UNITED STATES DISTRICT JUDGE
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